

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED  
SOCIETIES, et al.,

*Plaintiffs,*  
v.

MICHAEL MCDONALD, in his official  
capacity as Acting Chairman of the National  
Endowment for the Humanities, et al.,

*Defendants.*

Case No. 1:25-cv-03657

**DECLARATION OF FLORENCE C. HSIA**

I, Florence C. Hsia, declare as follows:

1. I am a resident of the State of Wisconsin. I am over the age of 18 and have personal knowledge of all the facts stated herein or have knowledge of the matters based on my review of information and records gathered by University of Wisconsin-Madison (UW-Madison) personnel. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by UW-Madison as the Associate Vice Chancellor for Research in Arts & Humanities. In my role, I provide leadership for humanities and related interdisciplinary research across campus by chairing review committees for institutional nomination competitions such as the NEH Summer Stipend program, reviewing project proposals by faculty intending to apply for NEH funding, and working with faculty and staff preparing applications to specific NEH funding programs. I make this declaration to provide information regarding UW-Madison's pending or planned proposals for National Endowment for the Humanities (NEH) funding opportunities.

3. UW-Madison is both an associate member and a research university consortium member of the American Council of Learned Societies. It has been an associate member since 1992, with its current associate membership running through Fall 2025, and it has been a research university consortium member since assessment year 2019-2020, with its current research consortium membership running through assessment year 2030-2031. UW-Madison is also a member of the American Historical Association.

4. As of June 5, 2025, UW-Madison has a total of five pending funding proposals with NEH. UW-Madison is unsure of the status of these proposals and the underlying programs or funding opportunities for which they were submitted, which include:

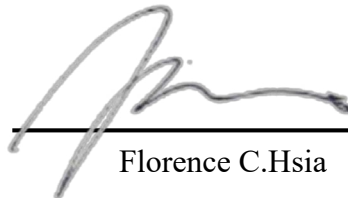
- Media Projects
- Humanities Research Centers on Artificial Intelligence

5. In addition to the pending proposal described above, UW-Madison faculty had also planned to submit proposals under a number of other NEH funding programs. These include:

- Institutes for Higher Education Faculty
- Dangers and Opportunities of Technology
- Summer Stipends
- State and Impact of the Humanities

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2025 in Madison, WI



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Florence C. Hsia